

**STATE OF CALIFORNIA
Energy Resources Conservation
and Development Commission**

In the Matter of:

Docket No. 07-AFC-06

**The Application for Certification
for the Carlsbad
Energy Center Project**

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**ENERGY COMMISSION STAFF RESPONSE
TO PETITION TO INTERVENE FROM
SOUTH CARLSBAD REDEVELOPMENT AGENCY**

By Petition dated August 5, 2009, the South Carlsbad Coastal Redevelopment Agency seeks to intervene in the above indicated proceeding. The Petition is signed by the attorney for the City of Carlsbad (City), and includes the Carlsbad City Attorney's name on the petition cover. For the duration of the proceeding, the City has raised issues regarding the South Carlsbad Redevelopment Area and the City's related concerns about the project. The interests of the City, as well as its representation, would appear to be the same for both the redevelopment agency and the City, and there is no reason why such interests cannot be properly represented by the City. Accordingly, staff believes that there is no benefit to adding an additional party to the proceeding to represent the redevelopment agency's interests. Where the interests of agencies are similar or identical and are sufficiently already represented in a siting case, staff believes that it is unnecessary and potentially burdensome procedurally to add redundant "parties." For these reasons, staff recommends that the petition be denied.

August 12, 2009

/s/
RICHARD C. RATLIFF
Staff Counsel IV